

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

**In re DOWNSTREAM ADDICKS  
AND BARKER (TEXAS) FLOOD-  
CONTROL RESERVOIRS**

**18-1968 L**

**THIS DOCUMENT RELATES TO:**

**Sub-Master Docket No. 1:17-9002L**

**NANCY SUE BAMMEL v. THE UNITED  
STATES OF AMERICA**

**PLAINTIFF'S SHORT FORM COMPLAINT**

By submitting this document, Plaintiff(s) adopts and incorporates by reference the Consolidated and Amended Downstream Master Complaint (ECF No. 23) filed in the above-styled Sub-Master Docket on January 16, 2018, and all subsequent amendments to that Complaint. The Plaintiff's Short Form Complaint is deemed Plaintiff's Original Complaint if it is plaintiff's original pleading, and must be filed as a new complaint through the Court's CM/ECF system.

If Plaintiff has previously filed an Original Complaint, the filing of a Plaintiff's Short Form Complaint amends and supersedes any prior complaint filed by the below-listed Plaintiff(s) In re Addicks and Barker (Texas) Flood-Control Reservoirs, Master Docket No. 17-3000L and/or In re Downstream Addicks and Barker (Texas) Flood-Control Reservoirs, Sub-Master Docket No. 17-9002L.

1. Name of Plaintiff(s): Nancy Sue Bammel

2. Location by address of Plaintiff(s) property subject to Plaintiff(s) allegations of a Fifth Amendment taking without just compensation as a result of Addicks/Barker reservoir releases: 1015 Cranberry Hill Drive, Houston, Texas 77079

a. Tax number for identified property: Account No: 1128260000019

b. Real property interest possessed by Plaintiff(s) alleged to have been taken:

Ownership (*i.e.*, fee simple) ☒ Leasehold \_\_\_\_\_ Other \_\_\_\_\_

c. Manner of alleged taking of the property interest(s) listed in paragraph 2(b)

above: Temporary \_\_\_\_\_ Permanent \_\_\_\_\_ Both ☒

3. Type of property alleged to have been taken:

Real Property \_\_\_\_\_ Personal Property \_\_\_\_\_ Both ☒

RESPECTFULLY SUBMITTED,

SULLINS, JOHNSTON, ROHRBACH & MAGERS

By: /s/Michael J. Dulaney

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on December 26, 2018, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this matter.

Dated: December 26, 2018

By: /s/Michael J. Dulaney

MICHAEL J. DULANEY